

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Vanessa M Kirby and Eugene C Kirby,
Jr

Debtors,

Nationstar Mortgage LLC as servicer for THE
BANK OF NEW YORK MELLON f/k/a THE
BANK OF NEW YORK as Indenture Trustee
for Newcastle Mortgage Securities Trust
2007-1

Movant.

v.

Vanessa M Kirby and Eugene C Kirby, Jr
Debtors/Respondents,

Kenneth E. West, Office of the Chapter 13
Standing Trustee, Trustee
Additional Respondent.

BANKRUPTCY CASE NUMBER
23-13325-pmm

CHAPTER 13

11 U.S.C. § 362

CERTIFICATION OF NO RESPONSE

Nationstar Mortgage LLC as servicer for THE BANK OF NEW YORK MELLON f/k/a
THE BANK OF NEW YORK as Indenture Trustee for Newcastle Mortgage Securities Trust
2007-1 ("Movant"), by and through its attorneys, LOGS Legal Group LLP, represents as follows:

1. Movant has filed its Motion for Relief, from the Automatic Stay (the "Motion")
and has given notice to all required parties of the Motion, Notice of Hearing and of the necessity
to file an answer.

2. The time to answer or otherwise respond to the Motion has expired, and no
answer has been filed.

3. The Trustee has been given the notices mentioned above and has not notified
Movant of his intention to contest the Motion.

WHEREFORE, Movant requests that the Court enter an Order granting Movant relief
from the automatic stay. A proposed order to such effect is submitted herewith.

Respectfully submitted,

Dated: 09/06/2024

BY: /s/ Christopher A. DeNardo
Christopher A. DeNardo, 78447
Heather Riloff, 309906
Leslie J. Rase, 58365
LOGS Legal Group LLP
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ORDER

AND NOW, this _____ day of _____, 2024, at the Eastern District of Pennsylvania, upon the consideration of the Motion of Movant for Relief from the Automatic Stay (the "Motion"), and the failure of Debtors to file an answer, appear or otherwise respond to the Motion, and for good cause shown, it is

ORDERED AND DECREED that the Automatic Stay of all proceedings, as provided under Section 362 of the Bankruptcy Abuse Prevention and Consumer Protection Act of 2005 (the "Code"), 11 U.S.C. § 362, is lifted to allow Movant, or its successors, if any, to proceed with its rights under its loan documents for the property located at 111 East Berkley Avenue, Clifton Heights, PA 19018; and it is

FURTHER ORDERED that Rule 4001(a)(3) is not applicable and Movant, or its successors, if any, may immediately implement this order.

BY THE COURT:

HONORABLE PATRICIA M. MAYER
UNITED STATES BANKRUPTCY JUDGE

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CERTIFICATE OF SERVICE

I, Christopher A. DeNardo, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of Cert of No Response to Motion for Relief by First Class Mail, postage prepaid, at the respective last known address of each person set forth below on this 6th day of September, 2024:

Vanessa M Kirby, 111 East Berkley Avenue, Clifton Heights, PA 19018

Eugene C Kirby, Jr, 111 East Berkley Avenue, Clifton Heights, PA 19018

Jeanne Marie Cella, Esquire, Jeanne Marie Cella and Associates LLC
221 N. Olive Street, Media, PA 19063
paralegal@lawbsc.com - VIA ECF

Kenneth E. West, Office of the Chapter 13 Standing Trustee, Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107
ecfemails@ph13trustee.com - VIA ECF

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
TRUE AND CORRECT.

/s/ Christopher A. DeNardo

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Heather Riloff, 309906
Leslie J. Rase, 58365
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